

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCHE”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**SUPPLEMENT TO PLAINTIFFS’ MOTION TO ENJOIN DEFENDANT CANTWELL
FROM MAKING UNLAWFUL THREATS AGAINST PLAINTIFFS AND PLAINTIFFS’
COUNSEL**

Plaintiffs write to supplement our pending Motion to Enjoin Defendant Cantwell from Making Unlawful Threats Against Plaintiffs and Plaintiffs' Counsel ("Plaintiffs' Motion") with additional information in support of our request from a most unlikely source: Mr. Cantwell's own attorneys. Last week, Mr. Cantwell's attorneys, James Kolenich and Elmer Woodard, filed a Motion to Withdraw as Counsel for Mr. Cantwell, based in part on Mr. Cantwell's "allegedly threatening internet communications directed at Ms. Kaplan, lead attorney for the Plaintiff's [sic]." ECF No. 531 at 2. With reference to Mr. Cantwell's conduct that is the subject of Plaintiffs' Motion, Mr. Kolenich and Mr. Woodard wrote that Mr. Cantwell "has engaged in conduct [Mr. Kolenich and Mr. Woodard] consider repugnant or imprudent" (*id.*) and noted that Mr. Cantwell had "arguably caused a fellow Attorney to have concerns for her safety." *Id.* at FN 7. Mr. Cantwell's attorneys candidly stated they "are at a loss as to how we would be able to argue Ms. Kaplan's concerns and requests for relief as expressed to the Court are unreasonable." *Id.* at FN 5.

While Mr. Cantwell's attorneys' arguments are not a formal response to Plaintiffs' Motion, we respectfully request that their views be considered along with Plaintiffs' Motion.

Date: July 31, 2019

Respectfully submitted,

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2019, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on July 31, 2019, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan
a/k/a: Loyal White Knights Church of
the Invisible Empire, Inc.
c/o Chris and Amanda Barker
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East Coast Knights of the Ku Klux Klan
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Augustus Sol Invictus
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Fraternal Order of the Alt-Knights
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I further hereby certify that on July 31, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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